

WOLLMUTH MAHER & DEUTSCH LLP
500 Fifth Avenue, 14th Floor
New York, NY 10110
Tel. 212-382-3300
James N. Lawlor, Esq.
Brad J. Axelrod, Esq.
Cassandra Postighone, Esq.

Attorneys for Richard Bruce and Ronald Olbrysh

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

SEARS HOLDINGS CORPORATION, *et al*,

Debtors.

Case No: 18-23538 (RDD)

Chapter 11

(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that pursuant to Section 1109(b) of Title 11 of the United States Code and Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure, the law firm of Wollmuth Maher & Deutsch LLP, appears as counsel for Richard Bruce and Ronald Olbrysh, and requests that all notices and documents be served upon:

Wollmuth Maher & Deutsch LLP
500 Fifth Avenue, 12th Floor
New York, NY 10110
(T) 212-382-3300
(F) 212-283-0050
James N. Lawlor, Esq.
Brad J. Axelrod, Esq.
Cassandra Postighone, Esq.
Email: JLawlor@wmd-law.com
Email: BAxelrod@wmd-law.com
Email: CPostighone@wmd-law.com

PLEASE TAKE FURTHER NOTICE that the foregoing request for service includes hardcopies of all notices and documents of any kind, including, without limitation, all pleadings,

notices, applications, motions, complaints, plans disclosure statements, and orders, whether written or oral, formal or informal, however transmitted or conveyed, related in any way to the above-captioned Debtors, the property of the Debtors, or their chapter 11 estates.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Service of Papers (the “Notice”) nor any later appearance, pleading, proof of claim, claim, suit or other filing shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) the right to trial by jury in any proceeding triable in this cases or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice, (v) an election of remedies, or (vi) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity under any agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

PLEASE TAKE FURTHER NOTICE that if any limited service lists are used in these proceedings, the undersigned requests inclusion thereon.

Dated: New York, New York
June 4, 2019

Respectfully submitted,

By: /s/ Cassandra Postighone
Cassandra Postighone, Esq.
Wollmuth Maher & Deutsch LLP
500 Fifth Avenue
New York, New York 10110

*Attorneys for Richard Bruce and
Ronald Olbrysh*